

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

*I.C., a minor, by and through his natural  
parent, NASIM CHAUDHRI, et al.,*

*Plaintiffs,*

v.

ZYNGA INC.,

*Defendant.*

Case No. 4:20-cv-01539-YGR

**ORDER GRANTING JOINT STIPULATION  
TO FILE AMENDED CONSOLIDATED  
COMPLAINT AND TO AMEND  
SCHEDULING ORDER**

*Carl Johnson, et al.,*

PLAINTIFFS

v.

*Zynga Inc.,*

DEFENDANT

Case No. 4:20-cv-02024-YGR

*Joseph Martinez IV, et al.,*

PLAINTIFFS

v.

*Zynga Inc.,*

DEFENDANT

Case No. 4:20-cv-02612-YGR

*Christopher Rosiak, et al.*

PLAINTIFFS

v.

*Zynga, Inc.,*

DEFENDANT

Case No. 4:20-cv-05674-YGR

**ORDER GRANTING JOINT STIPULATION TO FILE AMENDED CONSOLIDATED  
COMPLAINT AND TO AMEND SCHEDULING ORDER**  
**Case Nos. 4:20-cv-01539-YGR; 4:20-cv-02024-YGR; 4:20-cv-02612-YGR; 4:20-cv-**  
**05674-YGR**

After having met and conferred, and consistent with the discussion between the parties and the Court at the March 1, 2021 case management conference, Plaintiffs in the *Chaudhri* action (*I.C., et. al., v. Zynga Inc.*, Case No. 4:20-cv-01539), Plaintiffs in the *Johnson* action (*Johnson, et al., v. Zynga Inc.*, Case No. 4:20-cv-02024), Plaintiffs in the *Martinez* action (*Martinez, et al., v. Zynga Inc.*, Case No. 4:20-cv-02612), and Plaintiffs in the *Rosiak* action (*Rosiak, et al., v. Zynga, Inc.*, Case No. 4:20-cv-5674) (collectively, “Plaintiffs”) along with Defendant Zynga Inc. (“Zynga”) (together, the “Parties”) stipulate as follows:

1. In order to facilitate the efficient resolution of claims brought against Zynga in the aforementioned actions, the Parties—subject to the approval of the Court—agree that:

- a. The *Chaudhri*, *Johnson*, *Martinez*, and *Rosiak* actions shall be consolidated for all purposes.
- b. The *Martinez*, *Johnson*, and *Rosiak* actions shall be administratively closed and all future filings shall be made in the *Chadhrri* action, Case No. 4:20-cv-01539.
- c. If a related action is subsequently filed in or transferred to this District, it will be consolidated into this action and administratively closed, without further order of the Court. A party in such action wishing to object to consolidation must file an application for relief from this order within ten (10) days after the date on which the party’s counsel receives a copy of this order.
- d. Plaintiffs shall have up to and including March 12, 2021 to file a Consolidated Amended Class Action Complaint.
- e. Zynga shall have up to and including April 21, 2021 to move to dismiss Plaintiffs’ Consolidated Amended Class Action Complaint and/or move to arbitrate claims brought by Plaintiffs Amy Gitre, Lisa Thomas, and Joseph Martinez.

- 1 f. Plaintiffs shall have up to and including May 26, 2021 to oppose Zynga's motion to  
2 dismiss and/or motion to compel arbitration.  
3 g. Zynga shall have up to and including June 30, 2021 to reply to Plaintiffs' opposition  
4 to its motion to dismiss and/or motion to compel arbitration.  
5 h. A hearing on Zynga's motion to dismiss and/or motion to compel arbitration shall  
6 be scheduled to take place before the Court on July 27, 2021.  
7

8 2. The Parties respectfully request the Court enter an Order consistent with the foregoing.

9 **IT IS SO STIPULATED.**

10 Dated: March 5, 2021

11 By: /s/ Adam J. Zapala

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**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: March 9, 2021

  
The Honorable Judge Yvonne Gonzalez Rogers  
United States District Court Judge